

Consultation process for European Credit (Transfer) System for Vocational Education and Training in the Czech Republic

Characteristics of current situation in the Czech Republic

In the Czech Republic at present many significant processes are underway which in a fundamental manner influence the environment associated with the assumed effect of the credit transfer system, i.e., in particular in the area of qualifications and in vocational education.

(1) A process has been initiated and is successfully underway for the creation of a national framework of qualifications for the Czech Republic, so-called, National System of Qualifications. The created system has these basic characteristics :

- It is established in terms of legislation by a law (No 179/2006 Coll., concerning the verification and acknowledgment of the results of further education), the main components of which designate the full and partial qualifications described by the so-called qualification and evaluation standards,
- It will be a common system framework for initial and further education and for the acknowledgement of the results of further education,
- It is created in close cooperation with all the relevant partners,
- It connects up with the newly created National System of Vocations and will be a bridge between the worlds of work and education,
- It will contain qualifications (qualification standards) divided (grouped) into individual levels. It will be possible to compare qualifications with each other, and they will have a clear relation to the European Qualification Framework (EQF).

(2) Most of the sections of the law on acknowledging the results of further education¹ have been prepared, passed and will become effective in August 2007 (certain provisions became effective on 5. 5. 2006). The text of the law is conceived in such a way that it motivates the adult population in the Czech Republic to further education, it expands the possibilities of individuals to gain new qualifications and improve their position on the labour market and improve the reaction of the education system to the needs of the labour market.

In addition to the fact that it establishes the National System of Qualifications in legislation, the law defines or regulates in particular these areas:

- system for verifying and acknowledging the results of further education,
- qualifications,
- qualification standards for partial qualifications,
- evaluation standards for partial qualifications,
- rules relating to authorisation and authorised persons,
- rights and duties of participants of further education,

¹ Act No 179/2006 Coll., concerning verification and acknowledgment of results of further education and concerning the amendment of certain acts (act concerning acknowledgment of results of further education).

- responsibility for system of acknowledgment of results of further education.

(3) A significant project of the Ministry of Schools, Youth and Physical Education (MSYPE) has been initiated and is being successfully performed (system project called “Acknowledgment of Results of Informal Education and Information Teaching in Networks of Schools Providing Education Services to Adults”) focussing on the development of acknowledgment of the results of non-formal education and informal teaching in the network of schools providing education services for adults.

The aim of the project is to contribute to the development of further education in the Czech Republic by building up a network of schools in another six regions (they have already been built up in two of them) which in addition to initial education will also implement further education. Another aim of the project is the proposal, creation and pilot implementation of a system for acknowledging the results of non-formal education and informal teaching within the bounds designated by the aforementioned law.

(4) Act No 561/2004 Coll., concerning pre-school, primary, secondary, higher vocational and other education (Schools Act), as subsequently amended, legislatively established the curriculum reform in initial vocational education. Its basic traits are the two-stage creation of curricula (schools prepare state-approved framework education programmes for individual fields of education in the form of special school education programmes) and focus on results of education.

In initial vocational education, both of the acts referred to link up as a result of the fact that the requirements of qualification standards for full qualifications are projected into the framework education programmes.

The common denominator of all the processes or activities mentioned and key element of their conception is focus on target **competencies (abilities) and results of teaching**.

For this reason overall it is possible to evaluate the current situation in the Czech Republic as having a **suitable** perspective and being **relatively open** for any use of a tool like the proposed ECVET. But neither does this also **confirm the necessity of rapid introduction of such a system in the Czech Republic**.

Ensuring and course of consultation process

The consultation process for the European Credit (Transfer) System for Vocational Education and Training was initiated in the Czech Republic in January 2007. In terms of content and organisational ensuring it was divided up as follows:

- The consultation process for ECVET in the Czech Republic was performed under the direction of MSYPE.
- Group 2 of the MSYPE (general, vocational and further education) had overall responsibility for the course of the consultation process for ECVET and for the processing of the report for the EC.
- A national seminar was held at the MSYPE on 9. 3. 2007 under the direction of department 23 and the National Institute for Vocational Education (NIVE) Prague with the participation of workers from the individual ministries, regional authorities and social partners.
- NIVE has contributed to the content and organisational ensuring of the consultation process in the agreed scope.

In the preparatory period (up to 31 January) input information was prepared for participants of the consultation process, as were tools for processing its results.

The minister of state for education sent a letter to sk. 2 with a request for the appointment of experts who would join in the consultation process, all ministries interested in whole-life learning and other relevant partners from the area of employment and education. At the same time, other experts in advisory bodies and structures cooperating with MSYPE and NIVE were addressed by the director of NIVE and asked on behalf of MSYPE to join in the consultation process. In the context of the consultation process, more than **150 experts** were addressed in total.

All the nominated experts were sent a Czech translation of the consultation document, i.e., the working document of the European Commission ECVET containing questions for the consultation process. And at the same time they were all afforded additional information concerning ECVET (*it was made available to those interested on the internet pages www.nuov.cz in the form of files which further explain the technical specifications of ECVET, clarify certain terms, offer differing views of the issue or link to other information sources*) and an internet questionnaire for the consultation process, prepared on the basis of questions of the consultation document.

For each addressed expert, the filling in of the internet questionnaire was an alternative answer to the questions contained in the consultation document.

On 9 March 2007 in Prague, there was a national seminar in which almost fifty invited experts representing the relevant ministries and other national bodies and organisations, regional authorities and a wide group of organisations representing employers and unions participated.

At the seminar, the standpoints gained in the course of the consultation process for ECVET were summarised and discussed in the presence of leading workers from the MSYPE.

The wide-ranging discussion confirmed the framework content of the report about the results of the consultation process. Moreover a recommendation was expressed to conceive ECVET as a quantifying addition to EQF, as were certain suggestions concerning the national environment.

In the manner described, sufficient input data was gained on the basis of which it was possible to prepare a report for the European Commission.

Standpoint on ECVET for the Czech Republic

The standpoint on the ECVET for the Czech Republic **is strictly based on the views** of more than 60 experts who commented in writing on the consultation process. It is structured in a manner similar to that of the document of the European Commission which it is linked to.

The text is divided up into seven parts. The first two parts relate to the introductory framework information for the consultation document, the remaining parts focus directly on the five groups of questions which are given in the consultation document. *Quotations from the text of the consultation document are given in italics.*

1. Main problems and tasks for ECVET

The text of the document in this part justifies the need for ECVET by the fact that the attractiveness of mobility in education is limited by various factors, in particular the *“Absent measures for the transfer, validation and acknowledgment of the results of study gained abroad. The same applies for the transfer from one system of vocational education and preparation to another one or from the environment of informal learning to the context of formal professional preparation.”*

In this context there is obviously a valid question as to whether such measures are truly absent or whether the problem is excessive regulations which prevent or hinder the direct use of results of learning in the sphere of work or during the entry to subsequent education or in its course. In other words – the alternative to the blanket introduction of new tools for the formal acknowledgment of the results of learning is the application of generally binding regulations only in the area of regulated professions and regulated activities, and the regulated professions themselves and regulated activities, and the regulated education and preparation for their performance will be strictly limited to only those exceptional cases where there are really good reasons for this.

The text of the document also states that the main problems with which ECVET will have to deal consist, *“of the differing character of vocational education and preparation, of the large number and diversity of the people participating, and of the differences in national or branch systems of qualifications”*.

According to the limitation, it should only involve results, i.e., **qualifications** not **preparation** leading to them. And it is not clear how ECVET or any other tool would decrease and at the same time not diminish their diversity at the level of national and branch systems of qualifications:

- It may in the partial – quantitative – aspect make qualifications more transparent under the assumption that from the fundamental – qualitative - aspect these will be identified in part or in whole as mutually subsumable and thus comparable in relation to a certain considered or expressed comparative standard.

Along with the national framework for qualifications, in its metasystematic “transfer” function this should fulfil the function of the European Framework for Qualifications. But naturally for this it is not necessary to fragment comprehensive qualifications and introduce as realistic procedural units of teaching modules or other “minimum” compositional units of “building block” programmes of education/learning. And neither is this possible if the **true structure of qualification activities** (performed not to gain a good evaluation but for the purposes of creating the thing which is created by them) in the entire field of the division of labour (as is technically anticipated by the attempt at comparability and transparency of the results of learning defined for this entire field in the compositional method “from the bottom” accord to ECVET) is not to be subordinate to the technical requirement of “building block” structuring of results and thence the processes of learning.

- It can restrict the allowable level of divergence of certain individual qualifications, i.e., their project forms and their implementation practical forms, and the (limit and core) framework **definition from the European level** of qualification standard for each of them and the evaluation standard for their

granting (in a similar way to framework education programmes for a certain field in our country define – also only as a metaframework - the permissible limits of diversity in the framework of the field at the level of school education programmes) if the processing of the “transfer” EQF is taken to such a level of vocational specifications of knowledge, skills and competencies.

For this framework limitation of permissible diversity of qualifications amongst the countries or amongst fields it also naturally applies that the system classification of complex qualifications into units of results of learning assumed in ECVET is not necessary or even useful. It would only be so if it does not involve a restriction of the extent of divergence of qualifications and qualification systems but rather their **unification in the dimension of field/branch and territory**. But then it would be necessary to cancel the existing national qualifications of all fields and levels, and replace them with non-existent European or a range of transnational unifying qualifications of all branches and levels generated compositionally from units of results in order that ECVET could be introduced as a tool for attaining only the functions of their transferability and accumulability which it is assumed they will allow in the entire area of applicability of the thus adapted qualification system.

2. Principles of ECVET

In this part of the text, ECVET is presented overall as a *“method enabling the description of qualifications as transferable and accumulatable units of the results of learning (knowledge, skills and competencies) to which credit points are attached”*.

Should it involve qualifications applied on the labour market and should these qualifications describe using the results of learning, and if these results mean the results of learning of competencies, there will always be a certain combination of competencies (in certain cases, several combinations of competencies) which make the qualification applicable. These combinations are not interchangeable and cannot be replaced by other combinations, even though they would be evaluated using the same or higher number of credit points. It always depends on the concrete combination of competencies and not on their quantitative sum.

The evaluation of qualifications using credit points may be useful for those results of learning which are not unambiguously linked to a concrete qualification applicable on the market but which may occur in various combinations where they have their significance, but where they are replaceable by others. In this case it makes sense to add up their credit points. It may involve cross-section competencies or qualifications (for example, management), general education and broadly profiled qualifications (primarily for higher qualification levels where more than concrete qualifications it often involves a broad portfolio of knowledge and competencies).

The aforementioned delimitation of ECVET as methods anticipates and assigns à priori as a given the fact that:

- the functions of the method (transfer and collection of partial results of learning) are only and unambiguously useful,
- the proposed instrumental adaptation of the method (allocating qualifications to units with allocated numbers gainable credits) is a method of choice for fulfilling the relevant functions,

- the use of the method is necessary from the system aspect and is beneficial (i.e., the targets contained in the functions and the submitted method of their attainment are always and under all circumstances necessary or useful),
- the alternatives of functions and methods of their attainment not specified would always and under all circumstances be worse possibilities.

But in reality no method is a panacea. And in this context the reality arises that in the entire consultation document for ECVET there is no full **SWOT analysis** (or version of it) or consideration of differentiated use of ECVET according to balances of its necessity/superfluousness or usefulness/uselessness.

The definition of targets shown hereunder according to which “*ECVET should facilitate the transfer and collection of results of learning which people had gained coming from one learning context to another, from one system of qualifications to another*” is certainly a more commensurate delimitation.

Despite this, one must raise the objection that the meeting of these targets of ECVET in the described form need not always be necessary or even beneficial in view of the fact that:

- both mobility in the sense of exchange international stays and the acknowledgment of results of non-formal education and informal learning are also possible without ECVET (as is already shown by the fact that both have been and are being implemented at various times and in various countries even without it in various manners),
- The price for the systematic application of the elements of ECVET (classification of qualifications into units of results of learning with allocated number of gainable credits and concurrent modularisation of curricula of preparation corresponding to the qualification levels of VET in the scope of the entire field of the division of labour and cooperation, i.e., systematic fragmentation of complex qualifications in this scope) is high. And at the same time it is only technically necessary if for some sufficient reasons we insist on interdepartmental/intersectoral and international comparability of the value of the various **concrete qualifications** of the same qualification level.

The ECVET system should be implemented on a voluntary basis without the designation of legal obligation, because its intention is not the introduction of a mandatory system of regulation. In the case of its application in the individual member states of the European Union, a procedure will be applied based on existing legal regulations in the field of acknowledging qualifications.

The fact that “*ECVET will be based on the voluntary participation of member states and parties interested in the relevant systems of qualifications and in vocational education and preparation*” is, however, *disputable*, because it is evident that the generated pressure for the joint adoption and blanket introduction of the system in the entire EU will bring with it the fact that it really will be introduced by most countries. Then any country which does not introduce it will necessarily find itself at a disadvantage as a result of incompatibility with the other.

3. Purpose of system ECVET and reasons for its creation

4.2.1 Purpose of system ECVET and reasons for its creation

- *In the consultation document are the most important tasks and functions of the European system for credits for vocational education and preparation and the role of the competent authorities fully summarised? If not, what is missing?*
- *What should be the main added value of the planned system of ECVET?*

Despite the fact that respondents in general answered the question of the introductory block positively, and for most of them the consultation document is a sufficient source of information, many shortcomings were identified, for example:

- in the document there is insufficient specification of the role of the competent authorities. Confidence and cooperation can only exist in the case of a well built system and rules for all concerned.
- Little attention is given to the ECVET system in the area of promotion, presentation and acquainting the expert public in general. It is necessary to ensure the maximum dissemination of information about ECVET and to correct and amend the entire system as a result of feedback.
- The submitted document is not prepared in all parts in such a way that it provides a sufficient amount of the necessary information for all partners for whom it is intended.
- The abbreviations used in the material should be explained.
- It would be appropriate to work on the system for result transfers more. The relationship with the national system for verifying and acknowledging results of further education is also described.
- The addition of the method for deriving the value of one credit is also absent

The added value of the system ECVET is evident from the document for most respondents, and most of them identify with the value referred to in the document – development of cooperation between partners involved in vocational education, contribution for the development of mutual confidence, increasing the transparency of qualifications and support for the validation of results of whole-life learning and mobility leading to a professional qualification.

At the other end of the spectrum there are warnings that the “main added value of ECVET is insufficiently characterised, and the description of significance and allocation of credits in the document is non-specific for the layman.

4. Technical basis of ECVET

4.2.2 Technical basis of ECVET

- *Is it necessary to designate certain technical specifications with the aim of practical implementation of ECVET in more detail? If so, which?*
- *Do the technical specifications of ECVET sufficiently take into account:*
 - ◆ *evaluation,*
 - ◆ *validation,*
 - ◆ *acknowledgment,*
 - ◆ *gathering,*
 - ◆ *transfer*

of results of learning, be they formal, non-formal or informal? If no, please give details.

- *Is the allocation of credit points for qualifications and units and the use of an agreed number of 120 credit points sufficient to ensure the convergence of approaches and coherence of the system at the European level? If not, what would you recommend?*

Most respondents did not have problems with describing the technical basis of ECVET. But more than half of them perceive the designation of the role of competent bodies as a problem.

The input data gained also contains these examples of unclear points, recommendations and warnings of problems:

- There is no clear designation of the criteria for allocating credit points (the criteria should be designated as precisely as possible).
- It is not clear whether the credit system also includes the element of general (language) education.
- It is not clear why the number of points is strictly designated in advance (it would be sufficient to do this during implementation).
- It is not clear how other education activities will be included in the system – requalification, further professional education in companies, further professional education of office workers, further education of workers in teaching.
- The content of the terms validation and acknowledgement is not wholly clear. There should be a better description of the relationship between them, and an illustrative example mapping out the procedure should be given.
- The proposal of 120 credit points should be verified as a pilot scheme with the aim of discovering whether this value is sufficient.
- Examples of units are absent (in view of their scope and subsequent possibility of transfer).
- So far the role of the competent authorities is described only in outline.

5. Implementation of ECVET

4.2.3 Implementation of ECVET

- *Under which conditions could description of qualifications in the form of results of learning and expressing these qualifications in units effectively improve the transparency of qualifications and contribute to the development of mutual faith?*
- *Which criteria or combination of criteria for the allocation of credit points could be selected and used?*
- *In your system of qualifications are there any aspects which could be positive for the introduction of ECVET? What restrictions, if any, do you foresee?*
- *How and in what time frame (rollout, introduction, experimenting, extensive introduction) could ECVET be implemented in your country?*

In the consultation document several conditions are proposed (in connection with the first of the questions) which respondents should be asked directly. Their reaction counts as support for opinions contained in the document.

In connection with the second question, the following criteria or combination thereof are recommended:

- Credit points should be allocated with regard to the study burden of the relevant units then making up the qualifications.

- The criteria should be unambiguously based on valid study documents (in the Czech Republic, from outline and school education programmes) of individual fields of education and knowledge, skills and competencies required for certain qualifications and from the use of results of the evaluation system.
- The criteria should be linked with the national qualification framework.
- There must be a time aspect in the criteria because education activities can follow on from each other or they must be renewed.
- One criterion should be the content of qualifications – breadth (volume) of knowledge, skills and general competencies which it is necessary to master – number of estimated study activities and work put in necessary to acquire the set of study results corresponding to a partial or full qualification.
- This is a highly complex process which will be influenced by subjective phenomena. It will probably be necessary for the proposal of the criteria for the allocation of credit points to be generated by independent subjects, for example sector boards, and approved by bodies responsible for the given qualifications at the national level.

In the context of the system or generated framework of qualifications in the Czech Republic, the specified aspects tend to be positive:

- Integrated system of type positions and their connection to the system project focussing on the creation of a national system of qualifications (NSQ).
- Vocational schooling developed from the systems aspect, possibility of allocating to each field its credit weighting. As a result this means connecting qualification and evaluation standards with the credit system.
- System projects managed by MSYPE which are implemented with the aim of creating a national framework of qualifications (NSQ) and system for acknowledging the results of non-formal education and information learning.
- Act No 179/2006, concerning the verification and acknowledgment of results of further education and concerning the amendment of certain acts (act concerning acknowledgment of results of further education).
- Created national system of qualifications allowing the connection of full qualifications with partial ones.

Considerations concerning the timetable of possibilities for introduction of ECVET are being conducted in the Czech Republic for these timeframes:

- the nearest possible year for initiating activities leading to the rollout of ECVET is 2010.
- pilot verification should probably be initiated (without undue delay) in 2011 and should continue for at least three years.
- Gradual “blanket” introduction (on the basis of preceding verification and analysis of processes) is recommended for the period from 2011 to 2014.

6. Measures in support of implementation and development of ECVET

4.2.4 Measures in support of implementation and development of ECVET

- *Which types of measures should be adopted on a European, national and branch level in order to simplify the implementation of ECVET?*

- *Which documents, manuals and guides should be created to simplify the implementation of ECVET?*

Within the framework of the consultation process, many accompanying and supporting measures have been proposed. For the European level they are, for example,:

- promotion of education systems of individual European countries and the European labour market (publication of situation in the supply and demand for labour in the individual branches),
- decisions of European Commission, rules for acknowledging qualifications by personnel units according to branch,
- designating concrete competent national bodies which will coordinate implementation of ECVET,
- introducing EQF (improvement in transparency of qualifications) in relation to introduction of national frameworks of qualifications,
- creating methodology for introducing ECVET and converters of qualifications and units between individual countries. Probably a European etalon according to which the national ECVET systems would be set.
- Support for free movement of labour and systematic support for vocational experience and exchanges of students and interns.
- Preparing more detailed technical specification.
- Gradual unification of individual national qualification system.

For the Czech Republic they are, for example,:

- inclusion of ECVET in prepared Strategy of Whole Life Learning of the Czech Republic,
- greater “national” support for creation of system for acknowledging the results of informal education,
- greater support for creation of sector boards.

Examples of proposed and recommended documents are:

- document containing basic characteristics of the system ECVET, explanation of basic terms, definition of competent bodies, procedures for implementation of ECVET, resources for implementation,
- manual for provider of vocational education and preparation; manual for individual passing through vocational education and preparation,
- manual with examples of individual documents (containing in particular sample memoranda, sample record of results, sample examples of units, binding rules for evaluation, rules for accrediting evaluation subjects,
- e-learning manuals; processed outputs of pilot projects; examples of good practice; web pages in all national languages,
- audiovisual presentation of successful pilot events along with study input data,
- general catalogue of units, catalogue of professions in units.

7. Potential of ECVET to increase mobility

4.2.5 Potential of ECVET to increase mobility

- *To what extent and how will ECVET be able to contribute to creation supranational and even national partnership?*
- *To what extent and how will ECVET be able to help the improvement of the quality of programmes of the Community for mobility and participation in these programmes?*
- *In your opinion, to what extent and how will ECVET and Europass complement each other with the aim of increasing mobility?*

The consultation process in general confirms the positive expectations of experts on how it will be capable of contributing to the creation of supranational and national partnership and in how it will help during the improvement of quality of programmes of the Community and support of mobility and participation in these programmes. Similarly, positive expectations are associated with the mutual complementing of ECVET and Europass during support for mobility.

But overall the positive mood of the reaction to this part of the questions is made problematic by the fact that the respondents didn't give any concrete proposals, despite being called upon so to do.

Concluding recommendations

The two significant European instruments EQF and ECVET were prepared to a significant extent in parallel. It is probable that it was originally done with the ambition of being the same from the qualitative and quantitative aspect for qualifications and vocational education.

The Commission decided that both of the instruments will be submitted and offered separately to the European expert public and then to all countries in Europe. And this is the basis for the main idea of the recommendation from the consultation process in the Czech Republic: **“let us create an advantage from the separation and time differentiation of both instruments”**.

From this point of view the following is proposed:

1. Create a time delay distinguishing the implementation of EQF and ECVET sufficiently long so that it is possible to perform a subsequent analysis focussing on the positive and negative points and the potential risks for the introduction of a system of the type ECVET (best of all also analyses of influence of EQF/NQF on the European VET system). Also utilise the time gained to support various activities leading to a minimisation of risks discovered by the proposed analyses and thus attain a state where there is no danger that ECVET will not be introduced in a large number of European countries.

Associated note:

In the case that ECVET is not introduced in a significant number of countries, it loses authorisation as a part of the instruments for implementation of the so-called European concept of whole-life learning.

2. Confirm and from the aspect of the ECVET emphasise as the main task in the area of qualifications and vocational education in Europe by 2010 the practical implementation of EQF. In this context, complete work on EQF and use it as a resource to eliminate pointless barriers such as professions or activities regulated without sufficient justification. Utilise effect of newly created national frameworks of qualifications (frameworks the creation of which was initiated by activities associated with the implementation of EQF).

Associated note:

At the European level there should probably be a processing of EQF into a useable form also in terms of content fulfilled horizontal dimension of knowledge, skills and competencies (i.e., the individual certain files of knowledge, skills and competencies). Without its content definition, this qualitatively defining (identifying) dimension of EQF cannot define anything by the general category, and thus the use of EQF (or ECVET) is not possible, not even in its "metasystem" "conversion" role.

3. Establish ECVET as a continuing "European theme" for the period after 2010, and there will be massive support for a pilot verification of the possibility of forming a partnership with a significant "European dimension", and so a context will thus be created for introduction by initiatives from the bottom.

Associated note:

It is evidently possible to use evaluation using credit points more for knowledge than competencies. This is also associated with the fact that knowledge can be more easily quantified than competencies, which always constitute a qualitative unit with several dimensions and not a qualitative unit.

The international comparison of qualifications should have a certain strategy which would define the gradual steps which cannot skip each other:

- A. *classify qualifications to certain level of EQF,*
- B. *classify qualifications to concrete content element of common classification structure,*
- C. *for selected areas allocate credit points to qualifications.*